

1 T. LOUIS PALAZZO, ESQUIRE
2 Nevada Bar No. 4128
3 PALAZZO LAW FIRM
4 A PROFESSIONAL LAW CORPORATION
5 520 South Fourth Street, Second Floor
6 Las Vegas, Nevada 89101
7 Telephone: (702) 385-3850
8 Fax: (702) 385-3856

9 NATHAN F. GARRETT
10 *pro hac vice*
11 LUCINDA H. LUETKEMEYER
12 *pro hac vice*
13 GRAVES GARRETT LLC
14 1100 Main Street, Suite 2700
15 Kansas City, Missouri 64105
16 Telephone: (816) 256-3181
17 Fax: (816) 256-5958

18 *Attorneys for Defendant*
19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,
23
24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,
27
28 Defendant.

Case No.: 2:19-cr-00154-RFB-VCF-2

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR
NOVEMBER 9, 2023**

IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,
Assistant United States Attorneys, representing the United States of America, and LOUIS
PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant
Michael Halprin, that the sentencing hearing scheduled for November 9, 2023, at 2:30 p.m., in

1 the above-captioned matter, be vacated and continued to a date and time to be set by this
2 Honorable Court but no sooner than February, 12, 2024.

3 This stipulation is entered into for the following reasons:

4 1. Sentencing in this matter is currently scheduled for November 9, 2023, at 2:30 p.m.

5 2. On July 12, 2023, counsel for co-defendant Eghomware Igbinovia, aka Jerry Igbinovia,
6 and the government jointly moved to continue the calendar call and trial date. The calendar call
7 is now scheduled for February 6, 2023 and trial is now scheduled for February 12, 2024. Dkt.
8 Nos. 371 and 372.

9 3. Defense counsel needs additional time to investigate issues relevant to sentencing and
10 prepare for sentencing.

11 4. Mr. Halprin has appeared in this case, and is not in custody and, along with the
12 government, agrees to this continuance.

13 5. The additional time requested herein is not sought for purposes of delay and the denial of
14 this request for a continuance could result in a miscarriage of justice.

15 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
16 hearing for good cause. Good cause exists in this case.

17 7. Counsel for Defendant Michael Halprin and the government agree a continuance of the
18 sentencing hearing is in the best interests of justice.

19 8. For all the above-stated reasons, the ends of justice would be best served by the
20 continuance of the sentencing hearing.

21 This is the fourth request for a continuance of the sentencing hearing.
22
23
24
25
26
27
28

1 DATED: August 21, 2023.

2 By /s/ Nathan F. Garrett

3 GRAVES GARRETT, LLC

4 Nathan F. Garrett, *pro hac vice*

5 Lucinda H. Luetkemeyer, *pro hac vice*

6 PALAZZO LAW FIRM

7 A PROFESSIONAL LAW CORPORATION

8 T. Louis Palazzo, Esquire

9 *Counsel for Defendant Michael Halprin*

10 JASON FRIERSON

11 United States Attorney

12 By /s/ Jacob Operskalski

13 Jacob Operskalski

14 Assistant United States Attorney

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL HALPRIN,

Defendant.

Case No.: 2:19-cr-00154-RFB-VCF-2

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR
NOVEMBER 9, 2023**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Sentencing in this matter is currently scheduled for November 9, 2023, at 2:30 p.m.
2. Defense counsel needs additional time to investigate issues relevant to sentencing and prepare for sentencing.
3. Mr. Halprin has appeared in this case, and is not in custody and, along with the government, agrees to this continuance.
4. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

For all of the above-stated reasons, the ends of justice would best be served by an order vacating the current sentencing hearing date and continuing the sentencing hearing date no sooner than February 12, 2024.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for November 9, 2023, at the hour of 2:30 p.m., be vacated and continued to **February 22, 2024 at 9:15 a.m.**

DATED: August 22nd, 2023. .

A handwritten signature in black ink, appearing to be 'RFB' with a stylized flourish.

THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE